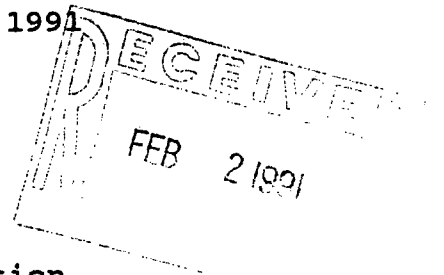




Weston Services, Inc.

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(201) 225-3990

1 February 1991



Mr. Edgar G. Kaup, P.E.
Case Manager
Bureau of Federal Case Management
Division of Hazardous Waste Management
New Jersey Department of Environmental Protection
5th Floor, 401 East State Street
Trenton, New Jersey 08625-0029

RE: **L. E. CARPENTER & COMPANY**
SUPPLEMENTAL REMEDIAL INVESTIGATION REPORT
NOVEMBER 1990

Dear Mr. Kaup:

WESTON Services, Inc. (WSI), on behalf of L. E. Carpenter & Company, has prepared the following responses to the New Jersey Department of Environmental Protection's (NJDEP) comments on the Supplemental Remedial Investigation Report dated November 1990. These comments were contained in a letter from the NJDEP to L. E. Carpenter & Company dated 18 December 1990. Our responses are organized so as to address each NJDEP comment in the order presented in the 18 December 1990 letter.

1. Section 1, Site Description

WESTON is in the process of collecting the data needed to verify the status of the three off-site wells identified in the RI. We expect to be able to provide the Department with a definitive answer within two weeks.

2. Section 2, Findings

- a. Page 2-2, Paragraph 2 - Section 2, provided a summary of the Remedial Investigation (RI). The results of samples collected from test pits TP-83, TP-86, TP-87 and TP-88 are part of the Supplemental Remedial Investigation and are discussed in Section 3 of the document dated November 1990.
- b. WESTON maintains that the statements made in paragraph 2, page 2-2 accurately reflect the findings of the RI. Moreover, WESTON strongly disagrees with the NJDEP's contention, as stated in its letter of 18 December 1990 that "...several compounds detected in [monitoring well] MW-13s (including methylene chloride and toluene)

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originated from the site [L.E. Carpenter] since these compounds were found in on-site groundwater and soils." WESTON disagreement is based on a review of the groundwater and soil quality data as presented in the RI Report, dated June 1990. The only groundwater samples which indicated concentrations of toluene or methylene chloride above detection limit were collected from MW-13s. Given the direction of groundwater flow as documented in the RI, Supplemental RI and quarterly monitoring reports, it does not appear feasible that the contaminants detected in MW-13s originate from the L.E. Carpenter Site.

3. Results

- a. Pages 3-7 and 3-8: As shown in Figure 1, WESTON believes that the extent of the free product on the Wharton Enterprises property has been sufficiently delineated for the purposes of the RI/FS. Specifically, while free product was observed in test pit TP-88, it was not observed in either test pit TP-87 (40 feet to the southeast) or in test pit TP-89 (70 feet to the east). In addition, free product has not been observed in monitoring well MW-14s which is approximately 50 feet northeast of test pit TP-88. The screen in this monitoring well begins about one foot below ground surface and is therefore well placed to detect any free product.
- b. The sentence in which the drainage ditch was suggested as a possible source of VOCs observed in AEC-B (page 3-8, second to last sentence, first paragraph) should be changed to read as follows:

"This suggests that possible sources of the VOCs in the soil include historical spills in the area groundwater and minor contributions by the drainage ditch."
- c. Page 3-35, Paragraph 3.4.2.3 - Sampling location SW/SS-10 will be resampled and analyzed for TCL BN+10 compounds as originally planned but omitted during previous sampling. This sample will be collected from the river adjacent to monitoring well MW-12.

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In addition, WESTON would like to make a correction to the Supplemental RI Report. In the report on page 3-35, WESTON stated that samples SW/SS-10 were collected adjacent to monitoring well MW-04. In fact the samples were collected adjacent to monitoring well MW-12 as originally planned. Plate 1, which shows the incorrect location for samples SW/SS-19, will be corrected and forwarded to the NJDEP once survey data for all supplemental sampling points is obtained and incorporated on to Plate 1.

- d. WESTON disagrees that site related groundwater contamination is accumulating in Rockaway River sediments. Data on groundwater flow in the shallow zone, as presented in the RI and subsequent quarterly reports, show flow parallel to or away from the Rockaway River. Therefore, WESTON does not feel additional sampling is necessary.
- e. Page 3-43 - The last sentence of the first paragraph of Subsection 3.6.2 is changed to read as follows:

"This result is consistent with VOC concentrations observed in adjacent test pit TP-87 and indicates that VOCs do not appear to be present above a concentration of 1,000 ug/kg in soils in the vicinity of the end of the abandoned sewer line."
- f. WESTON disagrees that the soil sample results from test pit TP-89 showing VOC concentrations below 1,000 ug/kg indicate that groundwater contamination has migrated to the abandoned sewer line. Groundwater sample results from monitoring well MW-14s, collected during the RI, have not shown any detectable concentrations of VOCs in the shallow groundwater zone in the vicinity of test pit TP-89. (The screened interval in monitoring well MW-14s is ten feet beginning less than one foot below ground surface).



Mr. Edgar G. Kaup P.E.
NJDEP

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If you have any other questions regarding our response, please
contact me at (201) 225-3990.

Very truly yours,

WESTON SERVICES, INC.

David Henderson
Project Manager

DH/apc

cc: C. Anderson
M. O'Neill